

**EBMUD Responses for the Delta Stewardship Council
Water Supply Reliability Panel
Sacramento
April 15, 2011**

Intro – EBMUD serves water to 1.3 million people in Alameda and Contra Costa Counties and obtains most of its water supply from Mokelumne River watershed, which is located to the east of the Delta. EBMUD is vitally interested in the development and implementation of the Delta Plan because the Mokelumne River is a tributary to the Delta, and also for the levee protection across five Delta islands provided to the aqueducts that supply EBMUD customers.

Although EBMUD's service area is expected to grow in both population and economic productivity, EBMUD's Water Supply Management Plan for 2040 proposes to meet the growing need for water by aggressively expanding EBMUD's water conservation and recycling efforts.

- EBMUD is currently conserving 23.5 million gallons per day (mgd) with a goal of an additional 39 mgd by 2040 through the implementation of new conservation programs or expansion of existing ones. This offsets the need for new water supply facilities in the Delta or locally that would yield the same amount.
- EBMUD is currently recycling 9 mgd, which will expand to 20 mgd by 2040.

EBMUD's primary supply, the Mokelumne River, drains a relatively small watershed that is prone to severe flow reductions during periods of drought.

- To be prepared for an extended drought, EBMUD has pursued supplemental projects to supply customers, supplemented by 15% mandatory rationing of systemwide demand during shortages.
- EBMUD realizes that the efficient use of water, especially during dry periods, will require regional strategies that include partnerships with multiple water agencies.
- EBMUD is an active partner with four other Bay Area agencies to investigate a regional desalination facility.
- EBMUD assumes that any future water supply enhancement projects on the Mokelumne will include regional integration to permit the most efficient and sound use of limited water resources.

We have provided some specific markups of WR P2 that we believe would provide for a more effective implementation approach.

- The Council's primary objective should be the review of pertinent information to demonstrate reduced reliance on the Delta.
- Attempting to regulate the preparation of IRWM plans is unnecessary and has the potential to establish a dual set of standards with those already promulgated by DWR.

- The Council should not mandate participation in IRWM plans if a project proponent has an alternate plan (i.e. adopted UWMP, GWMP) or source of information (i.e. approved report) that presents comparable information.

Regarding WR R2, EBMUD believes the Council should study and incorporate to the extent possible the groundwater policy recently released by ACWA, titled “Sustainability from the Ground Up: A Framework for Groundwater Management in California”.

EBMUD recommendation for WR P2.

WR P2. Regional Water Self-Sufficiency. All ~~water agencies~~ entities within the study area of the Delta Plan that propose Covered Actions involving the transport of water supplies within the Delta shall present information to the Council demonstrating how the project participants are reducing reliance on the Delta for water supplies. This requirement may be satisfied by ~~implement a plan similar to an~~ Integrated Regional Water Management Plan prepared pursuant to Guidelines published by the Department of Water Resources, or an alternative plan or source of information that provides comparable information, ~~no later than January 1, 2015 and shall update that plan at least every five years. Water resource planning covered actions are inconsistent with the Delta Plan should these regional plans not be developed and implemented.~~ Key elements of the plan(s) or information that must be submitted to the Council shall include:

- Planning for possible interruption of Delta water supply
- Water use efficiency (*w/o specifying standards that may be inconsistent w/DWR stds*)
- Water recycling
- Sustainable water supply
- Use of currently non-potable groundwater
- Storm water capture and recharge
- Seawater desalination